



Carla Varriale
Direct Dial: (646)-747-5115
Email: Carla.Varriale@hrrvlaw.com

Reply to New York Office

December 23, 2013

VIA ELECTRONIC FILING

Justice J. Paul Oetken
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: *Kaylee Gavigan v. Sterling Mets, L.P., et. al.*
Docket No.: 13cv4550
Our File No.: 03197-000184

Dear Justice Oetken:

We represent the defendants Sterling Mets, L.P., Christine Deveaux and Kim Manz-Smith (“defendants”) in the above referenced-matter. As a follow-up to the December 6, 2013 telephone conference with Your Honor, we have provided plaintiff and the Court with additional information concerning the citizenship of defendants.

Your Honor’s December 12, 2013 Order directed defendants to provide, “For each natural person who is a member of Mets Holdco, LLC, Defendant must identify their citizenship; for each corporation that is a member of Mets Holdco, LLC, Defendant must identify its state of incorporation and primary place of business; for each LLC or partnership that is a member of Mets Holdco, LLC, Defendant must identify the citizenship of each member of the LLC or partner in the partnership.”

1065 Avenue of the Americas ■ Suite 800 ■ New York, New York 10018
212-488-1598 ■ 212-564-0203 Facsimile

114 Old Country Road ■ Suite 300 ■ Mineola, New York 11501
516-620-1700 ■ 516-746-0833 Facsimile

170 Hamilton Avenue ■ Suite 210 ■ White Plains, New York 10601
914-290-6430 ■ 914-560-2245 Facsimile



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Accordingly, defendants have provided plaintiff with the following information as well as filed with the Court a Supplemental Corporate Disclosure pursuant to Local Civil Rule 7.1:

Mets Holdco, LLC has two members. Mets One LLC (which owns 50% of Mets Holdco, LLC) is a Delaware limited liability company and is a wholly owned subsidiary of Sterling Mets Associates (a New York partnership), whose partners all reside in either New York or Connecticut. Mets Two LLC (which owns 50% of Mets Holdco, LLC) is a Delaware limited liability company and is a wholly owned subsidiary of Sterling Mets Associates (a New York partnership), whose partners all reside in either New York or Connecticut.

We trust this additional information satisfies Your Honor's December 12, 2013 Order. If there are any issues with the information provided, or any additional information necessary, please contact the undersigned.

Thank you for your time and consideration.

Respectfully,

Carla Varriale

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Cc: VIA FACSIMILE: (212) 922-9077

Fred Litchmatcher, Esq.